

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

STEPHEN McCOLLUM, §
STEPHANIE KINGREY, and §
SANDRA McCOLLUM, §
individually and as §
heirs at law to the §
Estate of LARRY GENE §
McCOLLUM, §

Plaintiffs, §

VS §

BRAD LIVINGSTON, JEFF §
PRINGLE, and the TEXAS §
DEPARTMENT OF CRIMINAL §
JUSTICE, §

Defendants. §

CIVIL ACTION NO.
3:12-cv-02037

ORAL AND VIDEOTAPED DEPOSITION OF

ANANDA D. BABBILI

FEBRUARY 7, 2013

ORAL AND VIDEOTAPED DEPOSITION OF

ANANDA D. BABBILI, produced as a witness at the instance of the PLAINTIFFS, and duly sworn, was taken in the above-styled and numbered cause on the 7th day of February, 2013, from 9:52 a.m. to 12:50 p.m., before TINA TERRELL BURNEY, CSR in and for the State of Texas, reported by machine shorthand, at the Hutchins State Jail, 1500 E. Langdon Road, Dallas, Texas 75241, pursuant to the Federal Rules of Civil Procedure.

McCollum, et al. v.
Brad Livingston, et al.

Ananda D. Babbili
February 07, 2013

1 right?

2 A. Uh-huh. Uh-huh.

3 Q. Well, now, he wasn't on diuretics prior to
4 your changing him, right?

5 A. Uh-huh.

6 Q. Okay. What about someone who's technically --
7 and I say this with respect to Mr. McCollum because I
8 think I fit the bill now -- who's obese, 5'10", 330
9 pounds, that makes someone more susceptible to the
10 dangers associated with extreme heat as well, right?

11 A. Yes.

12 Q. Okay. What about someone who has diabetes,
13 does -- does the condition of diabetes make one more
14 susceptible to the dangers of extreme heat?

15 A. Yes.

16 Q. Is there anything -- you're a doctor. I'm a
17 lawyer. I mean, you know better than me probably. Is
18 there anything else about Mr. McCollum's condition
19 besides hypertension, being overweight/obese, being put
20 on a diuretic by you, that also would have made him, to
21 your knowledge, at a risk of extreme heat?

22 A. No.

23 MR. HARRIS: Objection,
24 mischaracterization of his prior testimony.

25 Q. Okay. Did you know that it got up to 150

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McCollum, et al. v.
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Ananda D. Babbili
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2 I, ANANDA D. BABBILI, have read the foregoing
3 deposition and hereby affix my signature that same is
4 true and correct, except as noted above.

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7 ANANDA D. BABBILI
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